

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

CIVIL ACTION

Plaintiff,

No. 2:22-cv-547

v.

Judge Horan

MICHAEL RUSSIN, RUSSIN
FINANCIAL, RUSSIN GROUP, SIMON
ARIAS, III, ARIAS AGENCIES, S.A.
HOLDING AMERICAN INCOME LIFE
INSURANCE COMPANY,

Defendant.

JURY TRIAL DEMANDED

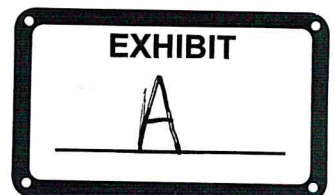
PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff Renee Zinsky, through her undersigned counsel, makes her initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedures and the Court's scheduling order.

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

A. Liability

- | | |
|---|---|
| 1. Renee Zinsky
5023 Sutton Place
Wexford, PA 15090 | Plaintiff has information concerning the allegations in her complaint. |
| 2. Malorie Fry
5023 Sutton Place
Wexford, PA 15090 | Ms. Fry has information concerning the allegations in Plaintiff's complaint. |
| 3. Michael Russin
11 Noble Lane
Windham, ME 04062 | Mr. Russin is believed to have information concerning the allegations in Plaintiff's complaint. |
| 4. Geneva Russin
11 Noble Lane
Windham, ME 04062 | Mrs. Russin is believed to have information concerning Defendant, Michael Russin's inappropriate behavior toward Plaintiff and other females. |



5. Simon Arias
103 Indian Meadow Drive
Mars, PA 16046
Mr. Arias is believed to have information regarding Defendant Michael Russin's hiring/employment with AIL/Arias Agencies, termination of Mr. Russin, Plaintiff's reports of fraud, sexual harassment and sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
4. Chrissy Vansuch
14612 Mirabelle Vista Circle
Tampa, FL 33626
813-475-4839
Ms. Vansuch is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
5. Natalie D'Achilles
150 Lake Drive
Wexford, PA 15090
724-612-3361
Mrs. D'Achilles is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
6. Katie McCabe
150 Lake Drive
Wexford, PA 15090
412-848-6722
Ms. McCabe is believed to have information regarding Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.
7. Steven Greer
1200 Wooded Acres
Waco, TX 76710
Mr. Greer is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.
8. David Zophin
1200 Wooded Acres
Waco, TX 76710
Mr. Zophin is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' policies and procedures regarding same.
9. Debbie Gamble
1200 Wooded Acres
Waco, TX 76710
Ms. Gamble is believed to have information regarding Mr. Russin's employment, Plaintiff's reports of fraud, sexual harassment/sexual assault, Defendants' response(s) thereto, Defendants' policies and procedures regarding same.